

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: NATIONAL FOOTBALL : No. 12-md-2323-AB  
LEAGUE PLAYERS' CONCUSSION :  
INJURY LITIGATION : MDL No. 2323

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THIS DOCUMENT RELATES TO :  
ALL ACTIONS :  
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**RIDDELL DEFENDANTS' NOTICE OF CORRECTION**

Defendants Riddell, Inc., All American Sports Corporation, Riddell Sports Group, Inc., Easton-Bell Sports, Inc., Easton-Bell Sports, LLC, EB Sports Corp., and RBG Holdings Corp. notify the Court and the parties of a correction to their Brief in Support of Riddell Defendants' Motion to Dismiss Based on LMRA § 301 Preemption (ECF No. 3592-1). Specifically, on pages two through three of that filing, the Riddell Defendants wrote: "This preemption applies even though the Riddell Defendants were not parties to the CBAs, because, as the Supreme Court has explained, the doctrine of complete preemption barring state-law claims 'is more aptly expressed not in terms of parties but in terms of the purpose of the lawsuit.'" (Citing *Wooddell v. Int'l Bd. of Elec. Workers*, 502 U.S. 93 (1991)). The sentence quoted above and its following citation sentence should instead read as follows:

This preemption applies even though the Riddell Defendants were not parties to the CBAs, because, as the Supreme Court and other courts have explained, the doctrine of complete preemption barring state-law claims "is more aptly described not in terms of parties

but in terms of the purpose of a lawsuit.” *E.g., Teamsters Nat'l Auto. Transporters Indus. Negotiating Comm. v. Troha*, 328 F.3d 325, 330 (7th Cir. 2003) (citing *Wooddell v. Int'l Bd. of Elec. Workers*, 502 U.S. 92 (1991)).

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 30, 2012, the foregoing Riddell Defendants' Notice of Correction was electronically filed and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/ Robert L. Wise \_\_\_\_\_